

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COLLEEN O'DONNELL,)	
)	
Plaintiff,)	
)	Civil Action No: 04-40190-FDS
v.)	
)	
ALBERTO R. GONZALES, ATTORNEY)	
GENERAL, U.S. DEPARTMENT)	
OF JUSTICE,)	
)	
Defendant.)	

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM
IN SUPPORT OF FOR SUMMARY JUDGMENT**

Defendant, Alberto R. Gonzales, the Attorney General for the United States of America, by his attorney, Michael J. Sullivan, the United States Attorney for the District of Massachusetts, hereby moves for leave to file a brief reply memorandum in support of his Motion for Summary Judgment. The government believes that the brief memorandum clarifies the issues before the Court and will assist it in reaching a decision on the pending motions for summary judgment.

Respectfully submitted,

Michael J. Sullivan
United States Attorney

By: /s/Damian W. Wilmot
DAMIAN W. WILMOT
Assistant U.S. Attorney
Moakley Federal Courthouse
One Courthouse Way, Suite 9200
Boston, MA 02110
(617) 748-3398

Dated: May 1, 2006

CERTIFICATION UNDER L.R. 7.1

I certify that in accordance with Local Rule 7.1, on May 1, 2006, I have attempted to contact the Plaintiff's counsel and was unsuccessful.

/s/ Damian W. Wilmot
DAMIAN W. WILMOT
Assistant U.S. Attorney